

Steven I. Adler
Todd Noshier
MANDELBAUM BARRETT PC
3 Becker Farm Road, Suite 105
Roseland, New Jersey 07068
sadler@mblawfirm.com
tnoshier@mblawfirm.com
Phone: 973-736-4600
Fax: 973-325-7467

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CC FORD GROUP WEST, LLC,

Plaintiff,

v.

JENNIFER JOHNSON, CARRIE BICKING,
BETH WEILER, PROJECT VELOCITY, INC.,
PROJECT VELOCITY PARTNERS, LLC,
MEREDITH MANNING, PHARMAESSENTIA
USA CORP., MATTHEW ORNELAS-KUH, and
JOHN DOES 1-10,

Defendants.

CASE NO. 3:22-cv-04143

*DOCUMENT ELECTRONICALLY FILED
VIA CM/ECF*

**L. CIV. R. 78.1 MOTION DAY
MAY 5, 2025**

**[PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION TO DEEM DEFENDANT
SERVED UNDER FED. R. CIV. P. 4(e) AND (e) OR TO EXTEND TIME TO
SERVE DEFENDANT AND APPROVE SERVICE BY ALTERNATE
MEANS AND FOR FEES AND FEES**

UPON THE MOTION OF Plaintiff CC Ford Group West, LLC (“Plaintiff,” “CC Ford” or “CCFW”) for an order to deem Defendant Matthew Ornelas-Kuh (“Defendant”) served under Fed. R. Civ. P. 4(e) and (m), or alternatively, extending time to serve Defendant by alternate means, and for an order awarding in Plaintiff’s favor, the fees and costs associated with this Motion pursuant to Fed. R. Civ. P. 4(d)(2), Fed. R. Civ. P. 37 and/or all other applicable rules, authority

and discretionary powers of the Court after Defendant refused to waive service of the pleading and summons under Rule 4(d), and upon review of the memorandum of law in support thereof, and all other relevant briefing including any Reply, and supporting documents thereof, that Plaintiff may submit as necessary and pursuant to L. Civ. R. 7.1(d)(3), including Plaintiff's Supporting Declaration of Costs and Fees, and for all other causes shown;

It is hereby **ORDERED** that Defendant's Motion be **GRANTED**; and Defendant is hereby deemed served under Fed. R. Civ. P. 4(e) and (m); and

It is hereby **ORDERED** that Defendant shall pay Plaintiff all costs and fees for having to bring Plaintiff's Motion, in the amount set forth in Plaintiff's Supporting Declaration of Costs and Fees; and

It is hereby **ORDERED** that the deadline for Defendants to answer or otherwise respond to the Second Amended Complaint shall be twenty-one (21) days from the date of this Order;

Or, alternatively:

It is hereby **ORDERED** that Defendant's Motion be **GRANTED**; and Plaintiff is hereby permitted to serve Defendant by alternate means, namely email, and such service shall be made within thirty (30) days of this Order.

UNITED STATES DISTRICT JUDGE